



**So Ordered**  
 /s/ Eric M Davis Sep 15, 2022

**EXHIBIT  
2**

**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE**

US DOMINION, INC., DOMINION	)	
VOTING SYSTEMS, INC., and	)	
DOMINION VOTING SYSTEMS	)	
CORPORATION,	)	Case No. N21C-03-257 EMD
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
FOX NEWS NETWORK, LLC,	)	
	)	
Defendant.	)	

**[PROPOSED] STIPULATED ORDER GOVERNING THE PRODUCTION  
AND USE OF THE JULY 1, 2021 HALDERMAN REPORT**

WHEREAS, an expert report by Dr. J. Alex Halderman (the “Report”) was submitted on July 1, 2021, by the plaintiffs in *Curling, et al. v. Raffensperger, et al.*, No. 1:17-cv-02989-AT (“*Curling*”), a lawsuit pending in the United States District Court for the Northern District of Georgia (the “Georgia Court”);

WHEREAS, the Georgia Court has entered a protective order in *Curling* that designates the Report as “Attorneys’ Eyes Only” and requires that it be kept under seal; and

WHEREAS, the Report contains information that is proprietary and commercially sensitive.

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court as follows:

1. Dominion will produce redacted and unredacted copies of the Report to FNN, while fully reserving its right to argue that the Report is irrelevant to the claims and defenses at issue in this matter and inadmissible at trial.
2. The parties agree to designate the Report as “Highly Confidential – Attorneys’ Eyes Only” under the Amended Order Governing the Production and Exchange of Confidential Information, granted by the Court on May 3, 2022 (“the Amended Protective Order). A copy of the Amended Protective Order is attached hereto as Exhibit A.
3. In the production, receipt, and use of the Report, the parties will also abide by the Protective Order ordered by Judge Amy Totenberg on July 11, 2019 in *Donna Curling et al. v. Brad Raffensperger et al.*, 1:17-cv-02989-AT (N.D. Ga. July 11, 2019), ECF No. 477 (“the *Curling* Protective Order”). A copy of the *Curling* Protective Order is attached hereto as Exhibit B.
4. The Report and any information contained therein or derived therefrom must be filed under seal.
5. To the extent a question arises regarding any potential conflicts between the requirements of the Amended Protective Order and the *Curling* Protective Order, the parties will meet and confer regarding the issue and may raise

any such conflicts to Special Master John Elzufon or the Georgia Court, as necessary, to obtain guidance and reach a resolution of the issue.

Dated: September 12, 2022

FARNAN LLP

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*Attorneys for Defendant*

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022

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The Honorable Eric M. Davis